

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ALLAEDHIN QANDAH,)
)
Plaintiff,)
)
v.) Case No. 4:20-CV-00053-JCH
)
ST. CHARLES COUNTY, *et al.*,)
)
Defendants.)

MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Allaedhin Qandah by and through counsel, respectfully requests leave of Court, pursuant to Local Rule 83 – 13.05(A) and Federal Rule of Civil Procedure 26(c), to file certain exhibits under seal from his Response to Defendants’ Motion for Summary Judgment.

In support thereof, Mr. Qandah states as follows:

1. This litigation involves voluminous records in the custody of Defendant St. Charles County involving personal identifying information for employees and inmates of the St. Charles County Jail.
2. In addition, portions of the deposition testimony in this case has been designated as “Confidential” by Defendants’ counsel pursuant to the Protective Order in this case. ECF No 23.
3. Accordingly, Plaintiff hereby seeks leave of this Court to file the following exhibits to Plaintiff’s Response to Defendants’ Motion for Summary Judgment and Plaintiff’s Statement of Additional Facts under seal, attached hereto:

- a. Exhibit 7, McKee I Dep. Excerpts;
- b. Exhibit 21, McKee II Dep. Excerpts;
- c. Exhibit 23, Qandah Health Progress Notes 1-2;

- d. Exhibit 30, Officer Cast Personnel File;
- e. Exhibit 37, Use of Force Reports;
- f. Exhibit 38, Officer Graebner Personnel File;
- g. Exhibit 42, Inmate Complaints; and
- h. Exhibit 43, Officer McKee Personnel File.

Wherefore, Plaintiff requests leave of this Court to file the attached exhibits to his Response to Defendants' Motion for Summary Judgment and his Statement of Additional Facts under seal.

Dated: September 11, 2020

Respectfully submitted,

ArchCity Defenders, Inc.

By:/s/ Maureen Hanlon

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